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**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

MELISSA HUTCHISON aka PHOENIX  
 MARIE, an individual,

Plaintiff,

v.

ETHICAL CAPITAL PARTNERS LTD., a  
 foreign entity; AYLO PREMIUM LTD., a  
 foreign corporation; DM PRODUCTIONS  
 LTD., a foreign entity; DIGITAL  
 PLAYGROUND, a foreign entity; MIND  
 GEEK USA INCORPORATED, a foreign  
 entity; MG PREMIUM LTD, a foreign  
 entity; DM PRODUCTIONS, a foreign  
 entity; DIGITAL PLAYGROUND, a foreign  
 entity; DANNY MARTIN aka DANNY D,  
 an individual; FRANK PETOSA an  
 individual; RYAN HOGAN, an individual;  
 MICHAEL WOODSIDE, an individual; and  
 DOES 1 through 50.

Defendants.

Case No.: 2:24-CV-00673-GMN-BNW

**STIPULATION AND ORDER  
 EXTENDING PLAINTIFF'S  
 DEADLINE TO RESPOND TO  
 MOTION TO DISMISS**

**(SECOND REQUEST)**

Under LR IA 6-1 and 6-2 and LR 7-1, Plaintiff Melissa Hutchison aka Phoenix Marie

Under LR IA 6-1 and 6-2 and LR 7-1, Plaintiff Melissa Hutchison aka Phoenix Marie

("Plaintiff") and defendant Aylo Premium Ltd. ("Aylo"), by and through their attorneys, hereby

agree and stipulate to the following:

1. On March 26, 2025, Aylo filed its Motion to Dismiss Plaintiff's Second Amended Complaint ("Motion"). ECF No. 58.

2. Plaintiff's counsel has an illness and therefore requested, and Defendants' counsel granted him a brief extension of time to file the opposition.

3. The Parties hereby stipulate to an extension of the response deadline to the Motion to April 16, 2025 to April 23, 2025. The Parties further stipulate to an extension of the Reply deadline which shall be due May 7, 2025.

4. This is the second request to extend the deadline for Plaintiff to oppose Aylos' motion to dismiss.

5. This request for an extension of time is not intended to cause any delay or prejudice any party.

Dated this 14<sup>th</sup> day of April 2025.

Dated this 14<sup>th</sup> day of April 2025.

**KERR SIMPSON ATTORNEYS AT LAW**

**MCDONALD CARANO LLP**

By: /s/ George E. Robinson  
P. Sterling Kerr, Esq. (NSBN 3978)  
George E. Robinson (NSBN 9667)  
2900 W. Horizon Ridge Pkwy. Suite 200  
Henderson, Nevada 89052  
*Attorneys for Plaintiff Melissa Hutchison  
aka Phoenix Marie*

By: /s/ John A. Fortin  
Rory T. Kay (NSBN 12416)  
John A. Fortin (NSBN 15221)  
2300 West Sahara Avenue, Suite 1200  
Las Vegas, Nevada 89102  
*Attorneys for Defendant Aylo Premium Ltd.*

**IT IS SO ORDERED.**

UNITED STATES DISTRICT JUDGE

DATED: April 16, 2025

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## Jennifer Hogan

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**From:** John A. Fortin <jfortin@mcdonaldcarano.com>  
**Sent:** Monday, April 14, 2025 5:19 PM  
**To:** Jennifer Hogan; Rory T. Kay; Leah Jennings; No Scrub  
**Cc:** George Robinson; No Scrub  
**Subject:** RE: Stipulation to Extend Response  
**Attachments:** 2nd Stip to Extend Opposition to 2nd MTD 4917-1992-7606 v.2((Unsaved-4\_14\_2025 5\_14\_28 PM)).doc

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi George,

Rory and I have been bouncing between hearings all day so my apologies about not responding earlier. I made a slight addition to extend our reply out two weeks following the opposition. This comports with our previous agreement on an extension. If this is acceptable, you can accept the redline changes and affix my e-signature to this and submit to the Court.

**John Fortin** | Attorney



P: 702.873.4100 | E: jfortin@mcdonaldcarano.com

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**From:** Jennifer Hogan <jennifer@kerrsimpsonlaw.com>  
**Sent:** Monday, April 14, 2025 4:31 PM  
**To:** Rory T. Kay <rkay@mcdonaldcarano.com>; John A. Fortin <jfortin@mcdonaldcarano.com>; Leah Jennings <ljennings@mcdonaldcarano.com>; No Scrub <NoScrub@mcdonaldcarano.com>  
**Cc:** George Robinson <george@kerrsimpsonlaw.com>  
**Subject:** Stipulation to Extend Response

Please see attached Stip. to Extend Response and let me know if you are ok with me E-Signing your name.

Thank you,

*Jennifer Hogan, Paralegal*  
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